

FOX ROTHSCCHILD LLP

Formed in the Commonwealth of Pennsylvania

By: John C. Atkin, Esq.

Princeton Pike Corporate Center

997 Lenox Drive

Lawrenceville, NJ 08648-2311

Tel: (609) 896-3600

Fax: (609) 896-1469

jatkin@foxrothschild.com

Attorneys for Plaintiff Strike 3 Holdings, LLC

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

AARON LARGE,

Defendant.

Civil Case No. 2:18-cv-927-KSH-CLW

**NOTICE OF MOTION FOR ENTRY
OF DEFAULT JUDGMENT**

TO: Aaron Large
10 Plymouth Place
Roseland, NJ 07068

PLEASE TAKE NOTICE that on September 4, 2018, at 9:30 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Strike 3 Holdings, LLC (“Plaintiff”) will appear before the Honorable Katherine S. Hayden, of the United States District Court for the District of New Jersey, at the

Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, to move the Court for the entry of a default judgment against Defendant Aaron Large (“Defendant”), pursuant to Federal Rules of Civil Procedure 55(b)(2), as follows:

1. Entering default judgment against Defendant on Plaintiff’s Amended Complaint [ECF No. 10] on the grounds of Defendant’s failure to plead or otherwise defend this action;
2. Entering a permanent injunction enjoining Defendant from continuing to infringe Plaintiff’s copyrighted works;
3. Entering a permanent injunction requiring Defendant to delete and permanently remove the digital media files relating to Plaintiff’s copyrighted works from each of the computers under Defendant’s possession, custody, or control;
4. Entering a permanent injunction requiring Defendant to delete and permanently remove the infringing copies of Plaintiff’s copyrighted works Defendant has on computers under Defendant’s possession, custody, or control;
5. Entering a judgment against Defendant awarding Plaintiff statutory damages per infringed work, in the amount of \$17,250.00, pursuant to 17 U.S.C. § 504(a) and (c).
6. Entering a judgment against Defendant awarding Plaintiff its reasonable attorneys’ fees and costs, pursuant to 17 U.S.C. § 505, and authorizing Plaintiff’s counsel to submit a declaration of attorneys’ fees and costs within a reasonable time of entry of Default Judgment;
7. Entering a judgment against Defendant awarding Plaintiff post-judgment interest at the current legal rate allowed and accruing, pursuant to 28 U.S.C. § 1961; and
8. Granting such other and further relief as this Court deems just and proper under the circumstances.

PLEASE TAKE FURTHER NOTICE that in support of this Motion for Default Judgment, Plaintiff will rely upon the accompanying Brief and Certification of John C. Atkin, Esq., submitted herewith; any reply papers in support of this Motion; and oral argument, if any.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(e), a proposed form of order is also submitted herewith for the Court's consideration.

DATED: August 8, 2018

Respectfully submitted,

FOX ROTHSCHILD LLP

*Attorneys for Plaintiff,
Strike 3 Holdings, LLC*

By: /s/ John C. Atkin, Esq. _____
JOHN C. ATKIN